

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Plunderbund Media L.L.C., et al.,

Plaintiffs

– vs –

Mike DeWine, Sued In His Official
Capacity as Ohio Attorney General, et al.

Defendants.

Case No. 1:17-cv-

Judge

Magistrate Judge

Plaintiffs' Motion for a
Preliminary Injunction

Plaintiffs Plunderbund Media, L.L.C., John Michael Spenelli, and the Portage County TEA Party, and each of them, by and through undersigned counsel and pursuant to FED.R.CIV.P. 65 (a), hereby move for a preliminary injunction – after a hearing and to remain in force through and until a trial on the merits can be held – enjoining the Defendants, and each of them, and their agents, attorneys, assigns and those in active concert with them, or any of them, who have notice of that injunction, from enforcing those portions of Ohio Rev. Code § 2917.21 (B)(1) and (2), that prohibit and allow for the punishment of online expression posted for the purpose of “abusing” or “harassing” another person.

Pursuant to Rule 65 (c), Plaintiffs respectfully move the Court to dispense with bond, or to set a nominal bond for the reasons set forth in in the attached Memorandum of Law, which states in detail the bases for this Motion and is hereby incorporated by reference herein.

Pursuant to Rule 65 (a)(1), Notice of this Motion is being provided to the Defendants, and each of them, at the same time and in the same manner as service of the Complaint by which this action was initiated.

Respectfully submitted,

/s/ Raymond V. Vasvari, Jr.

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*Pro Hac Vice admission pending

Attorney for Plaintiffs

— Certificate of Service —

The foregoing Motion for Preliminary Injunction was filed today, 16 May 2017, via the Court Electronic Filing System. Upon the appearance of counsel for Defendants, copies will be provided by and may be obtained by counsel through the CM | ECF System.

In addition, copies of this Motion and its supporting Memorandum of Law were served on each of the Defendants together with the Summons, Complaint, and other case initiating papers, each by Certified United States Mail, Return Receipt Requested, Sufficient Postage Prepaid, at the addresses below, the same day.

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Respectfully submitted,

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